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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

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15 UNITED STATES OF AMERICA,) Case No.: CR 11-0097 CRB (JCS)
16 Plaintiff,)
17 vs.) STIPULATION & [PROPOSED] ORDER
18 HUNG TIEU,) MODIFYING CONDITIONS OF RELEASE
19 Defendant.) AND RECONVEYING PROPERTY
20)
21)
22)
23)
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25)
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28)

17 The parties by and through their attorneys stipulate and agree that Defendant Hung
18 Tieu's conditions of release shall be modified as follows:

- 20 1. The Clerk of the Court shall forthwith reconvey the property located at 1232
21 Marlesta to Eric Chan and Gina Tu-Chan enabling them to refinance their property
22 with an anticipated closing date of January 16, 2012. The refinancing will not impact
23 the equity in the home posted as security for Defendant's release.
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25 2. Following the closing, this property shall be reposted as security for Defendant's
26 release, on or before January 30, 2012.

3. All other conditions shall remain the same.

/s/ Robert Rees

Dated: January 6, 2012

Robert Rees
Assistant United States Attorney

Dated: January 6, 2012

/s/ Gail Shifman

Gail Shifman
Attorney for Defendant Hung Tieu

[PROPOSED] ORDER

This matter having come before the Court upon the Stipulation of the parties and the
Court being informed,

It is ORDERED that Defendant Hung Tieu's conditions of release shall be modified as follows:

1. The Clerk of the Court shall forthwith reconvey the property located at 1232 Marlesta to Eric Chan and Gina Tu-Chan enabling them to refinance their property with an anticipated closing date of January 16, 2012. The refinancing will not impact the equity in the home posted as security for Defendant's release.
 2. Following the closing, this property shall be reposted as security for Defendant's release, on or before January 30, 2012.
 3. All other conditions shall remain the same.

Dated: January 9, 2012

